

## **EXHIBIT 7**

## Shaw, Todd

---

**From:** Garnett, Stanley <SGarnett@bhfs.com>  
**Sent:** Thursday, August 5, 2021 12:49 PM  
**To:** Papez, Elizabeth P.  
**Cc:** Barrett, Claudia M.; Stokes, Patrick F.; jtrusty@ifrahlaw.com; George Calhoun; Houseal, Amanda K.; Olguin, Catherine M.; Casazza, David; Shaw, Todd  
**Subject:** RE: Response to your emails

**[WARNING: External Email]**

Elizabeth,

-The Richards matter Judge, Robert McGahey, has retired and been replaced by Ross Buchanan. Judge Buchanan is a judge who takes a while to rule on things, so we I asked Nicole to try to go around him. I have asked Nicole Westbrook to see if Mr. Richards' counsel will consent to production of all confidential material to Amazon subject to the protective order in this case. Nicole expects to have an answer early next week. I will keep you posted, but I anticipate that we will be able to provide that production by COB on August 16, 2021.

-Mr. Watson and Northstar are constantly evaluating their financial situation but are unable to post the \$21 Million bond. If that changes, I will see that you are notified immediately.

-We should be able to provide complete detail on the Hoyt matter by COB on Monday, August 16, 2021.

Let me know if you have questions,

Stan Garnett

---

**From:** Papez, Elizabeth P. <EPapez@gibsondunn.com>  
**Sent:** Wednesday, August 4, 2021 8:37 PM  
**To:** Garnett, Stanley <SGarnett@bhfs.com>  
**Cc:** Barrett, Claudia M. <CBarrett@gibsondunn.com>; Stokes, Patrick F. <PStokes@gibsondunn.com>; jtrusty@ifrahlaw.com; George Calhoun <george@ifrahlaw.com>; Houseal, Amanda K. <ahouseal@bhfs.com>; Olguin, Catherine M. <COLGUIN@bhfs.com>; Casazza, David <DCasazza@gibsondunn.com>; Shaw, Todd <TShaw@gibsondunn.com>  
**Subject:** Re: Response to your emails

Thanks Stan.

Elizabeth P. Papez

## GIBSON DUNN

Gibson, Dunn & Crutcher LLP  
1050 Connecticut Avenue, NW  
Washington, DC 20036  
Tel +1 202.955.8608 (o)  
Tel +1 703.887.2062 (m)  
EPapez@gibsondunn.com  
www.gibsondunn.com

On Aug 4, 2021, at 10:00 PM, Garnett, Stanley <[SGarnett@bhfs.com](mailto:SGarnett@bhfs.com)> wrote:

[WARNING: External Email]

Elizabeth,

Apologies for not getting back to you today I had some unexpected developments in another case. I will respond to your email by noon, Mountain, tomorrow.

Thanks,

Stanley L. Garnett  
Brownstein Hyatt Farber Schreck, LLP  
410 Seventeenth Street, Suite 2200  
Denver, CO. 80202  
303.223.1286 tel  
303.668.3113 cell  
[Sgarnett@bhfs.com](mailto:Sgarnett@bhfs.com)

On Aug 3, 2021, at 9:29 AM, Papez, Elizabeth P. <[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)> wrote:

Thanks Stan. We appreciate your response. Regarding the points below:

- The Richards protective order states that production can be made on consent as we have discussed, so we look forward to the update on your clients' production. You mention below providing that update on August 3, which is today (not Wednesday). Can we expect to receive that update by mid-morning your time?
- On the injunction, our requests last week, like our requests since June 2020, were not confined to posting the entire \$21 million, but any portion thereof. Is it your clients' position that they are and have been unable to post even a penny of the required security from June 5 through today?
- Re the disposition of 800 Hoyt, and reserving all rights regarding information your clients were ordered to produce before now, when do you plan to you provide the detail you describe below regarding the \$13 million in sales proceeds? The timing is obviously sensitive given the posture of the case and your statement on Friday that you expect those proceeds to be distributed sometime in September.

Thanks again and regards,

**Elizabeth P. Papez**

**GIBSON DUNN**

Gibson, Dunn & Crutcher LLP  
1050 Connecticut Avenue, NW  
Washington, DC 20036  
Tel +1 202.955.8608 (o)  
Tel +1 703.887.2062 (m)  
[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)  
[www.gibsondunn.com](http://www.gibsondunn.com)

---

**From:** Garnett, Stanley <[SGarnett@bhfs.com](mailto:SGarnett@bhfs.com)>  
**Sent:** Friday, July 30, 2021 5:09 PM  
**To:** Papez, Elizabeth P. <[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)>  
**Cc:** Barrett, Claudia M. <[CBarrett@gibsondunn.com](mailto:CBarrett@gibsondunn.com)>; Stokes, Patrick F. <[PStokes@gibsondunn.com](mailto:PStokes@gibsondunn.com)>;  
[itrusty@ifrahlaw.com](mailto:itrusty@ifrahlaw.com); George Calhoun <[george@ifrahlaw.com](mailto:george@ifrahlaw.com)>; Houseal, Amanda K.  
<[ahouseal@bhfs.com](mailto:ahouseal@bhfs.com)>; Olguin, Catherine M. <[COLGUIN@bhfs.com](mailto:COLGUIN@bhfs.com)>; Casazza, David  
<[DCasazza@gibsondunn.com](mailto:DCasazza@gibsondunn.com)>; Shaw, Todd <[TShaw@gibsondunn.com](mailto:TShaw@gibsondunn.com)>  
**Subject:** Re: Response to your emails

**[WARNING: External Email]**

Elizabeth,

Thanks for your time today, with Patrick and Claudia. As we discussed, with regard to the three items you raised:

-Mr. Watson and Northstar are unable to post the \$21 Million. They are willing to do so, but simply do not have the funds. As you know, they tried to obtain a bond, but were unable to do so due to lack of unencumbered assets and, due to the financial situation, largely precipitated by this dispute, no one will issue a bond without security.

- Mr. Watson has not been the manager of the Hoyt LLC since June of 2020. The current manager is Don Marcotte . Mr. Watson and Northstar do not have access to or control of the \$13 Million in Hoyt proceeds. Though we believe previous discovery responses provided much of the information about this, and the relevant documents, we will work with Mr. Watson to provide a supplemental interrogatory response laying it out in more detail.

-Re: the Richards matter, i have spoken with Nicole Westbrook at Jones and Keller re: the documents in the Richards matter, which are controlled by a protective order issued by Judge McGahey. I will have an email update by mid morning Wednesday, August 3, regarding what will be necessary to produce those, consistent with the protective order.

I hope you all have a nice weekend.

Thanks,

Stanley L. Garnett  
Brownstein Hyatt Farber Schreck, LLP  
410 Seventeenth Street, Suite 2200  
Denver, CO. 80202  
303.223.1286 tel  
303.668.3113 cell  
[Sgarnett@bhfs.com](mailto:Sgarnett@bhfs.com)

On Jul 30, 2021, at 10:43 AM, Papez, Elizabeth P. <[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)> wrote:

Thanks and look forward to speaking.

Elizabeth P. Papez

## GIBSON DUNN

Gibson, Dunn & Crutcher LLP  
1050 Connecticut Avenue, NW  
Washington, DC 20036  
Tel +1 202.955.8608 (o)  
Tel +1 703.887.2062 (m)  
EPapez@gibsondunn.com  
www.gibsondunn.com

---

**From:** Garnett, Stanley <[SGarnett@bhfs.com](mailto:SGarnett@bhfs.com)>  
**Sent:** Friday, July 30, 2021 12:38 PM  
**To:** Papez, Elizabeth P. <[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)>  
**Cc:** Barrett, Claudia M. <[CBarrett@gibsondunn.com](mailto:CBarrett@gibsondunn.com)>; Stokes, Patrick F. <[PStokes@gibsondunn.com](mailto:PStokes@gibsondunn.com)>; [jtrusty@ifrahlaw.com](mailto:jtrusty@ifrahlaw.com); George Calhoun <[george@ifrahlaw.com](mailto:george@ifrahlaw.com)>; Houseal, Amanda K. <[ahouseal@bhfs.com](mailto:ahouseal@bhfs.com)>; Olguin, Catherine M. <[COLGUIN@bhfs.com](mailto:COLGUIN@bhfs.com)>; Casazza, David <[DCasazza@gibsondunn.com](mailto:DCasazza@gibsondunn.com)>; Shaw, Todd <[TShaw@gibsondunn.com](mailto:TShaw@gibsondunn.com)>  
**Subject:** Re: Response to your emails

**[WARNING: External Email]**

Elizabeth,

Thanks. Amanda and I will be ready to discuss these issues.

Stanley L. Garnett  
Brownstein Hyatt Farber Schreck, LLP  
410 Seventeenth Street, Suite 2200  
Denver, CO. 80202  
303.223.1286 tel  
303.668.3113 cell  
[Sgarnett@bhfs.com](mailto:Sgarnett@bhfs.com)

On Jul 30, 2021, at 10:33 AM, Papez, Elizabeth P.  
<[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)> wrote:

Stan – we look forward to talking shortly. To help focus the call, we understand that you'll be prepared to discuss:

- Your clients' response to our question last week about whether they're now willing to post some or all of the amount required by paragraph 2 of the June 2020 injunction;
- Whether WDC/Northstar or any other entity subject to either of your clients' control has possession or rights to any of the \$13M in Hoyt proceeds you said "Brian Watson" does not control, and

if not, who does control or have rights to those funds and where the funds are located;

- Your clients' position on producing information that is within their possession, custody or control and responsive to the requests they have been ordered to answer in our case, and that they either designated in the Richards case or could otherwise be produced under the Richards protective order with Mr. Richard's consent.

Thanks,

**Elizabeth P. Papez**

**GIBSON DUNN**

Gibson, Dunn & Crutcher LLP  
1050 Connecticut Avenue, NW  
Washington, DC 20036  
Tel +1 202.955.8608 (o)  
Tel +1 703.887.2062 (m)  
EPapez@gibsondunn.com  
www.gibsondunn.com

---

**From:** Garnett, Stanley <[SGarnett@bhfs.com](mailto:SGarnett@bhfs.com)>  
**Sent:** Thursday, July 29, 2021 7:22 AM  
**To:** Barrett, Claudia M. <[CBarrett@gibsondunn.com](mailto:CBarrett@gibsondunn.com)>  
**Cc:** Papez, Elizabeth P. <[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)>; Stokes, Patrick F. <[PStokes@gibsondunn.com](mailto:PStokes@gibsondunn.com)>; [jtrusty@ifrahlaw.com](mailto:jtrusty@ifrahlaw.com); George Calhoun <[george@ifrahlaw.com](mailto:george@ifrahlaw.com)>; Houseal, Amanda K. <[ahouseal@bhfs.com](mailto:ahouseal@bhfs.com)>; Olguin, Catherine M. <[COLGUIN@bhfs.com](mailto:COLGUIN@bhfs.com)>  
**Subject:** Re: Response to your emails

**[WARNING: External Email]**

That works.

Stanley L. Garnett  
Brownstein Hyatt Farber Schreck, LLP  
410 Seventeenth Street, Suite 2200  
Denver, CO. 80202  
303.223.1286 tel  
303.668.3113 cell  
[Sgarnett@bhfs.com](mailto:Sgarnett@bhfs.com)

On Jul 29, 2021, at 5:19 AM, Barrett, Claudia M.  
<[CBarrett@gibsondunn.com](mailto:CBarrett@gibsondunn.com)> wrote:

How about Friday at 1 pm Eastern?

**Claudia M. Barrett**  
Of Counsel

## GIBSON DUNN

Gibson, Dunn & Crutcher LLP  
1050 Connecticut Avenue, N.W., Washington, DC 20036-5306  
Tel +1 202.887.3642 • Fax +1 202.530.9619  
CBarrett@gibsondunn.com • www.gibsondunn.com

On Jul 28, 2021, at 7:25 PM, Garnett, Stanley  
<[SGarnett@bhfs.com](mailto:SGarnett@bhfs.com)> wrote:

**[WARNING: External Email]**

Thanks, Claudia. I'm testifying as an expert witness tomorrow and am on call pretty much all day for testimony and rebuttal. But Friday late am and afternoon look pretty open.

Best,

Stanley L. Garnett  
Brownstein Hyatt Farber Schreck, LLP  
410 Seventeenth Street, Suite 2200  
Denver, CO. 80202  
303.223.1286 tel  
303.668.3113 cell  
[Sgarnett@bhfs.com](mailto:Sgarnett@bhfs.com)

On Jul 28, 2021, at 5:10 PM, Barrett,  
Claudia M.  
<[CBarrett@gibsondunn.com](mailto:CBarrett@gibsondunn.com)> wrote:

Thanks for your email, Stan. Can you let us know your availability tomorrow for a call?

**Claudia M. Barrett**  
Of Counsel

## GIBSON DUNN

Gibson, Dunn & Crutcher LLP  
1050 Connecticut Avenue, N.W.,  
Washington, DC 20036-5306  
Tel +1 202.887.3642 • Fax +1 202.530.9619  
CBarrett@gibsondunn.com • www.gibsondu  
nn.com

---

**From:** Garnett, Stanley  
<[SGarnett@bhfs.com](mailto:SGarnett@bhfs.com)>  
**Sent:** Wednesday, July 28, 2021 6:43 PM  
**To:** Barrett, Claudia M.  
<[CBarrett@gibsondunn.com](mailto:CBarrett@gibsondunn.com)>  
**Cc:** Papez, Elizabeth P.  
<[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)>; Stokes,  
Patrick F. <[PStokes@gibsondunn.com](mailto:PStokes@gibsondunn.com)>;  
[jtrusty@ifrahlaw.com](mailto:jtrusty@ifrahlaw.com); George Calhoun  
<[george@ifrahlaw.com](mailto:george@ifrahlaw.com)>; Houseal,  
Amanda K. <[ahouseal@bhfs.com](mailto:ahouseal@bhfs.com)>;  
Olguin, Catherine M.  
<[COLGUIN@bhfs.com](mailto:COLGUIN@bhfs.com)>  
**Subject:** Response to your emails

**[WARNING: External Email]**

Claudia,

I write as a follow up to Defendants' third supplemental responses to Plaintiffs' interrogatories and in response to your emails from today and Monday, July 26, 2021.

Defendants have now provided to Plaintiffs their supplemental responses to Interrogatories 2, 3, and 6, which include additional information regarding Defendants' funds. Defendants have no amendment or supplement to their answers to Interrogatory No. 5. Additionally, Defendants have now provided the pre-April 1, 2020 documents on the privilege log.

With regard to your question concerning the document production of previously privileged documents, we produced entire families of documents



that were previously separated due to privilege claims. For example, where the privilege log had a single entry listing the main document as privileged and the attachments to that document were not privileged and were therefore previously produced, we produced the entire family. This increased the number of total documents produced. The highlighted records listed in your email have a one to one relationship with the log and have bates numbers listed on the log.

With regard to the Richards case, my July 26, 2021 letter did not confirm that there are responsive materials. In fact, knowing the general scope of that litigation, I doubt that there are responsive documents in that discovery. However, even if such exist, Jones and Keller, counsel of record on that matter for Mr. Watson and Northstar informed you some time ago that they are covered by a protective order, entered by Judge McGahey. Nicole Westbrook, the partner in charge of the Richards case at Jones and Keller told you this sometime ago. It is not my clients' obligation to seek amendment of a court order to release any "confidential" material that has been so designated pursuant to the protective order.

Finally, I think it is appropriate to note that we remain committed to working through any good faith discovery concerns with you and your colleagues, including in "meet and confer" phone conversations, such as my paralegal Catherine Olguin and I had last Thursday with you and 4 other lawyers from Gibson Dunn for over an hour. However, it is frustrating to have my general expressions of willingness to look into things and consider your position to be interpreted, "gotcha" fashion, as binding commitments.

Hopefully this answers your concerns,  
but if I have missed something, send me  
an email or we can (carefully) have  
another phone conversation.

Thank you,

Stan

Stanley L. Garnett  
Brownstein Hyatt Farber Schreck,  
LLP  
410 Seventeenth Street, Suite 2200  
Denver, CO. 80202  
303.223.1286 tel  
303.668.3113 cell  
[Sgarnett@bhfs.com](mailto:Sgarnett@bhfs.com)

<image001.png>

<image002.jpg>

STATEMENT OF CONFIDENTIALITY &  
DISCLAIMER: The information contained  
in this email message is attorney  
privileged and confidential, intended  
only for the use of the individual or  
entity named above. If the reader of  
this message is not the intended  
recipient, you are hereby notified that  
any dissemination, distribution or copy  
of this email is strictly prohibited. If you  
have received this email in error, please  
notify us immediately by calling (303)  
223-1300 and delete the message.  
Thank you.

STATEMENT OF CONFIDENTIALITY &  
DISCLAIMER: The information contained  
in this email message is attorney  
privileged and confidential, intended  
only for the use of the individual or  
entity named above. If the reader of  
this message is not the intended  
recipient, you are hereby notified that  
any dissemination, distribution or copy

of this email is strictly prohibited. If you have received this email in error, please notify us immediately by calling (303) 223-1300 and delete the message. Thank you.

---

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.

---

STATEMENT OF CONFIDENTIALITY & DISCLAIMER: The information contained in this email message is attorney privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this email is strictly prohibited. If you have received this email in error, please notify us immediately by calling (303) 223-1300 and delete the message. Thank you.

---

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.

---

STATEMENT OF CONFIDENTIALITY & DISCLAIMER: The information contained in this email message is attorney privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby

notified that any dissemination, distribution or copy of this email is strictly prohibited. If you have received this email in error, please notify us immediately by calling (303) 223-1300 and delete the message. Thank you.

---

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.

---

STATEMENT OF CONFIDENTIALITY & DISCLAIMER: The information contained in this email message is attorney privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this email is strictly prohibited. If you have received this email in error, please notify us immediately by calling (303) 223-1300 and delete the message. Thank you.

---

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.

---

STATEMENT OF CONFIDENTIALITY & DISCLAIMER: The information contained in this email message is attorney privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this email is strictly prohibited. If you have received this email in error, please notify us immediately by calling (303) 223-1300 and delete the message. Thank you.

---

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.

---

STATEMENT OF CONFIDENTIALITY & DISCLAIMER: The information contained in this email message is attorney privileged

and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this email is strictly prohibited. If you have received this email in error, please notify us immediately by calling (303) 223-1300 and delete the message. Thank you.

---

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.

---

STATEMENT OF CONFIDENTIALITY & DISCLAIMER: The information contained in this email message is attorney privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this email is strictly prohibited. If you have received this email in error, please notify us immediately by calling (303) 223-1300 and delete the message. Thank you.